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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

A.J. and Q.C.,

Plaintiffs,

vs.

MASP, LLC

Defendant.

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Civil Action No.  
1:23-cv-04247-JPB

**Rebuttal Report of Ms. Anique Whitmore**

**Submitted by Dr. Kimberly Mehlman-Orozco,  
CEO of Break the Chain LLC  
P.O. Box 678 Gainesville, VA 20156  
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**SUBMITTED BY DR. KIMBERLY MEHLMAN-OROZCO on October 20, 2024.<sup>1</sup>**



<sup>1</sup> I may prepare graphic or illustrative exhibits based on the information reviewed and/or my analyses for use at trial. I reserve the right to amend my analysis, opinions, and this report should additional information be made available. The Report of Anique Whitmore was made available to Dr. Mehlman-Orozco on Sep 25, 2024, at 7:31 AM. This Rebuttal Report is in addition to the information contained in Dr. Mehlman-Orozco's affirmative report, served on August 14, 2024.

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## **I. INTRODUCTION**

Since issuing the affirmative report on August 14, 2024, Dr. Kimberly Mehlman-Orozco has sat for two additional depositions:

1. Ramsbottom et. al. v. Ashton Case: 3:21-cv-00272 in Tennessee on August 28, 2024.
2. M.A. v. Wyndham et. al. Case: 19-cv-00849 in Ohio on September 4, 2024.

Dr. Mehlman-Orozco was also disclosed in one of her pro-bono matters— Datres v. Winfree et. al. Case No. 1:23-CV-519 in Michigan. This was shared with Dr. Mehlman-Orozco via email on September 27, 2024.

An updated CV is included herein as Appendix A.

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## II. DEFINITIONS

In order to facilitate precision in language, which is undoubtedly important when evaluating the present claims and Ms. Whitmore's report, I proffer the following definitions, which reflect commonly accepted understanding of key concepts in the sex trafficking literature or social scientific research. In addition, I may also from time-to-time use terms that are defined in the United States Code. I am not a lawyer and these definitions do not and are not intended to supplant the Court's legal interpretations. I am not offering, and do not intend to offer, any legal opinions.

**Epistemic Trespassing:** Epistemic trespassers are thinkers who have competence or expertise to make good judgments in one field, but move to another field where they lack competence—and pass judgment nevertheless. We should doubt that trespassers are reliable judges in fields where they are outsiders.<sup>2</sup>

**Simp:** In reference to the commercial sex industry, this is a person who emulates the lifestyle, dress, or mannerisms of a pimp, but is not actually engaged in the commercial sex industry.<sup>3</sup> Essentially, a person who pretends to be a pimp, but is not.

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<sup>2</sup> Ballantyne, Nathan. Knowing Our Limits. Oxford University Press (2019).

<sup>3</sup> See for example, Mehlman-Orozco, K, *Hidden in Plain Sight: America's Slaves of the New Millennium*, Praeger (2017). However, this has also adopted the meaning in popular culture for a male who is overly submissive to a female without reciprocated sentiments.

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### **III. SUMMARY OF OPINIONS<sup>4</sup>**

- a. Many of the opinions levied by Anique Whitmore are based on misinformation, unsupported speculation or subjective belief, or ecological fallacies, and are not supported by reliable principles and scientific methods.

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<sup>4</sup> All of my opinions are stated to a reasonable degree of social scientific probability in my profession as an expert in human trafficking and Ph.D. educated criminologist. These are in addition to the opinions outlined in the report dated August 14, 2024.

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## IV. REBUTTAL OF PLAINTIFFS' NAMED EXPERT

### **Anique Whitmore**

#### Credentials

Although Ms. Anique Whitmore has not earned a doctorate, she has a Master's degree in counseling psychology and a Bachelor's degree in education and social policy from Northwestern University. Ms. Whitmore appears to have over 21 years' worth of experience as a licensed psychotherapist who specializes in forensic psychotherapy and forensic interviewing. Ms. Whitmore claims to have provided expert testimony in the areas of sexual abuse, sexual exploitation and human trafficking, intimate partner abuse, trauma-based therapy, and child and adolescent development; however, it is not clear from the CV (pages 22-25) of her report or her list of cases (pages 26-38), which cases she served on regarding human trafficking or in what capacity she served. Therefore, while she boasts having been "qualified as an expert to testify in over 32 different jurisdictions in the United States and abroad, including federal court, the US Armed Forces, Superior Court, and Juvenile Court;" it is unclear how many of those cases actually involved trafficking allegations, as opposed to sexual assault, domestic violence, or child development.

Ms. Whitmore's report lists approximately 375 cases, without case numbers or years. The overwhelming majority of these cases appear to have no relation to human trafficking<sup>5</sup>. Some of these cases appear to be duplicates (e.g., *Dwayne C. Singleton, LLC State v Ariana Murphy*; *Fulton County DA State v Andra Clark*; *Fulton County DA State v Arnold*; *Fulton County DA State v David Ramsey*; *Fulton County DA State v DeAndre Hardy*; *Fulton County DA State v Ethan Barrett*; *Fulton County DA State v Garibey*; *Fulton County DA State v Hancock*; *Fulton County DA State v Hunnicutt*; *Fulton County DA State v Jamar Girley*; *Fulton County DA State v John Dries*; *Fulton County DA State v Joshua Harris*; *Fulton County DA State v Keith Zachary*; *Fulton County DA State v Keith Zachary*; *Fulton County DA State v Lorenzo Nino*; *Fulton County DA State v Mathis*; *Fulton County DA State v Munford*; *Fulton County DA State v Richard Tard*; *Fulton County DA State v Rudolph Anthony Cash*; *Fulton County DA State v Vickers*; *United States \_Fort Carson US v Melgarjo*; *US Fort Campbell US v Bensinger*; *USA \_JBLM US v Gonzalez*; and *USA \_JBLM US v Sanchez*). One of these cases is listed three times (*Fulton County DA State v Shakir Cole*) and one of these cases is listed six times (*Fulton County DA State v Saudi Wells*).

During her testimony on June 18, 2024 in the case of WK v. Red Roof Inns, Ms. Whitmore testified that she has been qualified over 455 times and represented that between 15-20% (68-91 cases) involved trafficking. It is important for Ms. Whitmore to disclose which of her past cases involve allegations of human trafficking and provide the case numbers to ensure that this is not a misrepresentation of her credentials. At present, I am only aware of Ms. Whitmore testifying

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<sup>5</sup> For examples, THE STATE v. NESBITT (2010) <https://caselaw.findlaw.com/court/ga-court-of-appeals/1530849.html>; *Dekalb County DA State v Godfrey Hubbard* <https://www.dekalbsuperiorcourt.com/wp-content/uploads/2021/11/November-17-2021-Pretrial-CalendarAfternoon.pdf>; *Dekalb County DA State v Jennifer & Joe Rosenbaum* <https://casetext.com/case/state-v-rosenbaum-15>;

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once in WK v. Red Roof Inns, and being disclosed a small number of times on cases containing allegations of human trafficking and/or TVPRA claims. For example:

Jane Doe v Suresh & Durga, Inc  
 WK v RRI  
 D.H. v. Tucker Inn  
 Jane Doe v Suresh & Durga, Inc  
 I.R. v. Riti, Inc.  
 A.J. and Q.C. v. MASP, LLC

As a subject matter expert on human trafficking, I question Ms. Whitmore's credentials and ability to testify reliably on the topic of trafficking because of her past propensity to misinform the trier of fact. For example, during her testimony in WK v. Red Roof Inns Ms. Whitmore was asked:

*"Can you walk the jury through some of what you've learned in your 27 years of experience?"*

To which she responded, in part:

*"Sure. And I won't recall all of them or I won't be able to kind of spit all of them out, but you will have -- gosh. You'll have renegade. Renegade is someone who has been under their pimp for some time and understands the rules very well so when that pimp needs to step away or is away, that that victim, that survivor, knows what to do and how to behave. They won't escape. They won't even attempt to escape because they know what's going to happen. If they tried or if they tried to leave, they'd get beat down. They would be suffocated, attempted to be drowned, they would be beat to unrecognition. They may have to be in a room and witness someone else getting beat out of being threatened."*

This is demonstrably inaccurate and Ms. Whitmore misinformed the trier of fact in this case. A "renegade" is actually a person involved in prostitution independently, **without** a pimp<sup>6</sup>. The Department of Justice defines this person as a person who **avoids control** of pimps<sup>7</sup>. What Ms. Whitmore was probably referring to was the term "automatic", which can be described as the "'automatic' routine when a pimp is out of town, in jail, or otherwise not in direct contact with those he is prostituting." In regards to trafficking, "automatic" victims are expected to comply with the rules and often do so out of fear of punishment or because they have been psychologically manipulated into a sense of loyalty or love. "**All money** generated on 'automatic' is turned over to the pimp. This money may be used to support his concession/phone account or to pay his bond if he's in jail."<sup>8</sup>

<sup>6</sup> <https://sharedhope.org/the-problem/trafficking-terms/> AND <https://portal.ct.gov/-/media/DCF/humantrafficking/pdf/termsusedinthelife.pdf?la=en#:~:text=Renegade%3A%20A%20person%20involved%20in%20prostitution%20without%20a%20pimp>.

<sup>7</sup> [https://www.justice.gov/sites/default/files/usao-edwi/pages/attachments/2015/03/06/ht\\_terms\\_-\\_slang\\_01\\_15\\_2015.pdf](https://www.justice.gov/sites/default/files/usao-edwi/pages/attachments/2015/03/06/ht_terms_-_slang_01_15_2015.pdf)

<sup>8</sup> <https://sharedhope.org/the-problem/trafficking-terms/> AND <https://portal.ct.gov/-/media/DCF/humantrafficking/pdf/termsusedinthelife.pdf?la=en#:~:text=Renegade%3A%20A%20person%20involved%20in%20prostitution%20without%20a%20pimp> AND [https://www.justice.gov/sites/default/files/usao-edwi/pages/attachments/2015/03/06/ht\\_terms\\_-\\_slang\\_01\\_15\\_2015.pdf](https://www.justice.gov/sites/default/files/usao-edwi/pages/attachments/2015/03/06/ht_terms_-_slang_01_15_2015.pdf)



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While Ms. Whitmore may have a wealth of experience on other areas, for example serving as a Guardian Ad Litem, Ms. Whitmore's experience specifically on trafficking, prostitution, or the commercial sex industry appears to be minimal or ancillary to her other roles. According to her CV, Ms. Whitmore does not have a single peer-reviewed publication, book, opinion editorial, abstract, poster, or academic presentation on the topics of trafficking, prostitution, or the commercial sex industry. Moreover, Ms. Whitmore's non-academic presentations on "trafficking" appear to be limited to:

1. Presenting at the HEAT San Diego Watch Conference on "Human Exploitation and Trafficking" in 2012;
2. Serving as a panelist at Out of Darkness Atlanta on "In Light of Epstein: Power, Corruption, and Trafficking" in 2020; and
3. Presenting to Andersen, Tate & Carr, P.C. on the Psychological Impact on Trafficked Victims in 2021<sup>9</sup>.

During her W.K. testimony, Ms. Whitmore was asked:

*"And you have not offered any peer-reviewed publications on sex trafficking?"*

To which she responded:

*"No. I don't enjoy writing."*

Furthermore, Ms. Whitmore has no experience on human trafficking research. In fact, her research experience appears to be limited to conducting "independent studies" on "The Glass Ceiling" and "Single African American Fathers," while in undergrad<sup>10</sup>, as well as working as a "research assistant" on "W.I.N.G.S, We're Involved Neighbors Growing Stronger," while pursuing her Master's degree.

### Opinions

As discussed previously, while Ms. Whitmore ostensibly has extensive experience as a practitioner on issues related to sexual abuse, domestic violence, and child and adolescent development, she appears to have little to no experience, training, or education specifically on human trafficking, prostitution, and the commercial sex industry. This potentially explains why Ms. Whitmore makes a number of erroneous assumptions, takes information out of context, and cites unreliable, outdated, and non-academic sources to support the unsupported speculations and subjective beliefs in her report. For examples, see Table 1.

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<sup>9</sup> Note: These are the Plaintiff's attorneys who retained Ms. Whitmore. I find it unconventional to list this as a "presentation."

<sup>10</sup> Note: I find it unconventional to include undergraduate papers on an expert witness CV and do not agree this constitutes "research experience."

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Table 1. Whitmore's Report Statements and Context or Countervailing Information

Page	Whitmore's Report Excerpts	Context or Countervailing Information
4	As anthropologists Christina and Richard Milner have explained, "A pimp wants his woman's mind more than her body. It is love, loyalty, and obedience he requires as well as a capacity for self-discipline." Brock, a pimp, put it to the Milners this way: "You create a different environment. It's a brainwashing process; the whole thing is creativity."	Here, Ms. Whitmore is citing a book published in 1973, entitled <u>Black Players: The Secret World of Black Pimps</u> . This book does not explicitly focus on trafficking, but instead the authors— Christina and Richard Milner —interviewed many of the top pimps in the Bay area and other parts of the country during the late 1960's/early 1970's, including pimp-turned-author "Iceberg Slim."
4	In this report, I am using the terms "trafficker" and "pimp" interchangeably to refer to the person who traffics persons for sex <sup>11</sup> .	<p>Ms. Whitmore's report fails to make a clear distinction between pimping and sex trafficking, which has been a point of contention in cases where she has testified. For example, Ms. Whitmore appeared to conflate pimping and trafficking in <i>WK v. Red Roof Inns</i>, but United States District Judge, <u>Honorable Victoria M. Calvert in the Northern District of Georgia, stated from the bench: "I don't think a pimp is always a trafficker."</u></p> <p>From a legal and criminological perspective, these terms are not interchangeable. Doing so may confuse the trier of fact. There are "pimps" who are not traffickers and "sims" who emulate the dress, speech, and mannerisms/ idiosyncrasies of "pimps," but are not engaged in trafficking (see <i>Supra</i> Definitions).</p> <p>Until 2000, pimping was treated as a misdemeanor in Georgia, which was rarely prosecuted. For example, in January 2001 the Atlanta Constitution published "Selling Atlanta's Children"— a three-part series <u>expose about 10 and 11 year old girls</u>, who were being prosecuted for prostitution, while their pimps went free. In fact, the article reported that "no one went to prison for just pimping" since 1972.</p> <p>Perhaps in response to this expose, pimps started to get charged with felonies for exploiting women and minors, such as <u>Charles Floyd Pipkins a.k.a. Sir Charles and Andrew Moore, Jr. a.k.a. Batman</u>. In November of 2001, Pipkins and Moore were two of fifteen Atlanta pimps who were arrested for exploiting minors in southwest Atlanta in an area around Metropolitan Avenue (formerly called Stewart Avenue) known as the "track" at the time. Pipkins was sentenced to 30 years in prison and Moore was sentenced to 40 years in prison.</p> <p>The length of the sentences was due to the fact that the evidence at trial demonstrated that Pipkins and Moore prostituted juvenile females-at least one of whom was as young as 12—from at least 1997 until their arrest in</p>

<sup>11</sup> Footnote 1 Page 4 of Whitmore Report.


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Page	Whitmore's Report Excerpts	Context or Countervailing Information
		<p>late 2001. The Defendants were convicted of conspiracy, in violation of 18 U.S.C. § 1962(d), to violate the Racketeering Influenced Corrupt Organizations Act ("RICO"), and of violations of a host of other criminal statutes.</p> <p>Thereafter, an increasing number of pimps started to get prosecuted for commercial sexual exploitation or trafficking. Additionally, there was a significant decrease in the number of children being charged with crimes related to prostitution and commercialized vice. Instead, these children started to be increasingly offered social services.</p> <p>A growing body of research suggests that the majority of commercial sex activity is between consenting adults and does not involve sex trafficking. <u>Additionally, minors rarely become involved through pimps</u>, but instead as runaways engaged in "survival sex." In some lower socioeconomic communities in Atlanta, pimps often become involved with the commercial sex industry through their families—"their dad was a pimp, or their mother was a hooker." While some purported experts would like to simplify this complex issue as "all pimps are traffickers," that is not based in reality.</p>
4	It is far more common to find sex trafficking between one trafficker and one or just a few victims.	There are no reliable data to support this claim and Ms. Whitmore fails to provide any citation to the basis.
5	One of the most prevalent places to find sex trafficking is in the hotel industry, where traffickers find a location for their victims to provide sexual acts.	<p>As discussed in depth in my initial report, I am not aware of any rigorous empirical study that assesses trafficking prevalence in hotels and Ms. Whitmore fails to provide any citation for this claim.</p> <p>Available data suggests that commercial sex occurs in a variety of places across Atlanta<sup>12</sup> in a variety of venues, including the street, erotic massage parlors, and brothels.<sup>13</sup></p>
5	Sex traffickers prey on vulnerable individuals in various ways, but it is often helpful to divide the process of recruiting and grooming a sex trafficking victim into two stages.	While I generally agree with Ms. Whitmore on this point, I find her explanation of what makes a person vulnerable to sex trafficking inadequate. For example, as I discuss in my book, <u>Hidden in Plain Sight: America's Slaves of the New Millennium</u> , trafficking risk is best conceptualized through the lens of Maslow's Hierarchy of Needs (for reference, see figure below). Essentially, an individual at risk of being trafficked more often than not has a void and a trafficker typically makes the false promise to fulfill

<sup>12</sup> <https://www.ajc.com/opinion/opinion-sex-trafficking-and-prostitution-are-happening-all-over-atlanta/U6BUS7P7HBD7RB2ID5LX36JMBY/>

<sup>13</sup> Dank, M. L., Khan, B., Downey, P. M., Kotonias, C., Mayer, D., Owens, C., ... & Yu, L. (2014). Estimating the size and structure of the underground commercial sex economy in eight major US cities. Urban Institute. [https://www.urban.org/sites/default/files/publication/22376/413047-estimating-the-size-and-structure-of-the-underground-commercial-sex-economy-in-eight-major-us-cities\\_0\\_1.pdf](https://www.urban.org/sites/default/files/publication/22376/413047-estimating-the-size-and-structure-of-the-underground-commercial-sex-economy-in-eight-major-us-cities_0_1.pdf)

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Page	Whitmore's Report Excerpts	Context or Countervailing Information
		<p>that void in order to facilitate exploitation.</p> 
5	In both initiation and indoctrination, traffickers use various physical, emotional, and psychological techniques to cause a victim to engage in commercial sex	Instead of citing peer-reviewed research on the recruitment and control strategies utilized by sex traffickers, such as Reid, Joan A. "Entrapment and enmeshment schemes used by sex traffickers." Sexual Abuse 28.6 (2016): 491-511, Ms. Whitmore incredulously cites <u>The Pimp Game: Instructional Guide</u> a self-published book by former pimp (not convicted trafficker) "Mickey Royal" in her expert witness report. Ms. Whitmore claims that this book describes the initiation and indoctrination schemes that traffickers use to cause a victim to engage in commercial sex, which is not an entirely accurate description.
6	The rotation of favorites often creates confusion and discord among victims leading to isolation, distrust, and competition to become what traffickers call the "bottom bitch," i.e., the victim who is at the top of a hierarchy of prostitutes within a sex trafficking operation.	<p>Ms. Whitmore ignores and/or fails to disclose the fact that the "bottom bitch" is also typically criminalized alongside the trafficker. For example, I served as an expert witness in the prosecution of <i>People v. James Joseph</i>. Joseph was prosecuted alongside one of his first victims and wife, Avisa Lavassani<sup>14</sup>. This illustrates how victims often behave as co-conspirators and/or consenting participants, which can lead to misidentification by criminal justice actors, as well as businesses, through no fault of these third parties.</p> <p>Additionally, depending on her report, Ms. Whitmore is known to have edited her definition of a "bottom bitch" from "victim" or "prostitute," which illustrates her inconsistency and lack of reliability. Regardless of her definition, she fails to accurately explain the nuance of this term. In criminal courts a "bottom bitch" is typically criminalized as a co-conspirator when and if she receives a significant financial benefit from the commercial sex. However, a "bottom bitch" who does not receive significant financial benefit can be viewed as a victim.</p>
6	Once emotionally involved, victims are even more vulnerable to manipulation by the trafficker through, for example, threats, drugs, and psychological coercion.	Although this statement has no citation in the present report, in past reports Ms. Whitmore cited another outdated book that focuses on prostitution, not sex trafficking—Barry, K. (1996) <i>The Prostitution of Sexuality</i> . NYU Press. Ms. Whitmore likely removed

<sup>14</sup> ABC. 2015. Couple accused of running high-priced prostitution ring in Danville. <https://abc7news.com/high-priced-prostitution-ring-human-trafficking-arrests-in-danville-san-ramon-anthony-reynolds/957101/>

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Page	Whitmore's Report Excerpts	Context or Countervailing Information
		the citation herein because I previously pointed out how this is illustrative of how Ms. Whitmore appears to conflate sex trafficking with prostitution and pimping with trafficking. Even though these terms are certainly connected, they are not interchangeable, especially when serving as an expert witness, as it may confuse the trier of fact. Removing the citation, but keeping information from an outdated book about prostitution is not appropriate.
7	The early period of this type of victimization is often referred to as the "seasoning process" in which the traffickers gain control through violence. Victims are often terrified and succumb at the hands of their traffickers.	<p>Similarly, in past reports, Ms. Whitmore writes: The early period of victimization is often referred to as the "seasoning process" in which the traffickers gain total control through violence. Victims are often terrified and succumb at the hands of their traffickers. Thus recruitment, force, deceit, profit, and coercion all play a role in the "life". A renowned pimp authored, <i>The Pimp Game: Instructional Guide</i> (2018), and in it describes the psychological manipulation that it takes to control the minds, bodies, and spirits of others.</p> <p>Instead of citing peer-reviewed research on the recruitment and control strategies utilized by sex traffickers, such as Reid, Joan A. "Entrapment and enmeshment schemes used by sex traffickers." <i>Sexual Abuse</i> 28.6 (2016): 491-511, Ms. Whitmore incredulously cites <u><i>The Pimp Game: Instructional Guide</i></u> a self-published book by former pimp (not convicted trafficker) "Mickey Royal" in her expert witness report. In her past reports, Ms. Whitmore claimed that this book describes the psychological manipulation that <b>traffickers</b> use to control the minds, bodies, and spirits of others, which I previously rebutted because it was not an entirely accurate description. Moreover, it is notable that she keeps the text, but removes the citation in the present report.</p>
7	Traffickers often initially suggest false or misleading facts about the work the victims will engage in, hiding the existence of commercial sex. Traffickers also might make false promises of a glamorous future.	<p>In the present report, Ms. Whitmore cites to a magazine article about "pimping," not trafficking, from 1995—Barry, K. (1995) Pimping: The World's Oldest Profession. OTI Magazine Online.</p> <p>While I agree with this point, that traffickers can use false and misleading facts to lure victims, Ms. Whitmore has a history of citing to outdated information and conflating her understanding of this complex topic with prostitution. I am concerned Ms. Whitmore may not have the education, training, or experience to assess the reliability of her sources and make a clear distinction between prostitution, survival sex, and sex trafficking, much less have the ability to evaluate the efficacy of identification protocol and draw causal inference between alleged trafficking and psychological harm.</p>
12	Moreover, studies have indicated that trauma worsens during the trafficking	In the present report Ms. Whitmore attempts to supported this statement by citing United Nations Office on Drugs and Crime (2008). <i>An Introduction to</i>

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Page	Whitmore's Report Excerpts	Context or Countervailing Information
	process and even persists beyond the end of any exploitive act or acts.	Human Trafficking: Vulnerability, Impact and Action. Page 81 of that report states, " <b><u>Because trafficking is an underground activity</u></b> , its consequences are also hidden and <b><u>adequate indicators have yet to be developed</u></b> that will allow the anti-trafficking community to successfully measure the impact of this crime" (bold, underline, italic added for emphasis). This counters claims by the Plaintiff and Ms. Whitmore in this case. <sup>15</sup>

After providing background information, Ms. Whitmore was tasked with evaluating the individual Plaintiffs. Specifically, she focused on assessing:

- “1. What methods, if any, did the victim’s trafficker use to exploit the victim?
2. Why did the victim not try to escape or seek help earlier?
3. What sort of effects, if any, has the trafficking at the Days Inn had on this victim?”<sup>16</sup>

Notably, Ms. Whitmore omitted a question that is typically asked of her in other cases,

- “1. What, if anything, made the victim vulnerable to sex trafficking?”

At no point in her report does Ms. Whitmore appear to even consider that the inconsistency in the Plaintiffs recollections; instead, she accepts their claims and testimony as entirely truthful and ignores countervailing information. More importantly, Ms. Whitmore appears to ignore the clandestine nature of these crimes and the challenges faced with identification and intervention by law enforcement, much less businesses, especially during a short timeframe. Additionally, Ms. Whitmore based her opinions predominately upon a single interview of A.J.<sup>17</sup>, which does not appear to be consistent with being trauma informed.<sup>18</sup>

Ultimately, Ms. Whitmore’s opinions are of questionable reliability and are inconsistent with the types of reliable and admissible testimony I have seen in court. For example, Ms. Whitmore claims that “In the opinion of this examiner, information obtained through this assessment is considered valid.”<sup>19</sup> However, Ms. Whitmore’s opinions appear to be based on the self-report of the Plaintiffs. Courts evaluating TVPRA claims have ruled that expert witness testimony assessing the credibility of the parties is inadmissible and should not be considered. See Fed. R. Evid. 702(a); Fed. R. Civ. P. 56(c)(2)<sup>20</sup>.

<sup>15</sup> Retrieved from [https://www.unodc.org/documents/human-trafficking/An\\_Introduction\\_to\\_Human\\_Trafficking\\_-\\_Background\\_Paper.pdf](https://www.unodc.org/documents/human-trafficking/An_Introduction_to_Human_Trafficking_-_Background_Paper.pdf)

<sup>16</sup> Whitmore Report, page 13.

<sup>17</sup> Whitmore Report, page 13.

<sup>18</sup> For example, according to the Office of Victims of Crime (OVC), these interviews should be gradual across multiple days/times and it is not reasonable for a victim to go into detail on the first interview.

<sup>19</sup> Whitmore Report, Pages 13 and 20.

<sup>20</sup> See, for example, *Corine Elat v. Caroline Raissa Emandop Ngoubene, et. al.* <https://casetext.com/case/elat-v-ngoubene>

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Ultimately, Ms. Whitmore appears to have predominately relied upon unsupported speculation or subjective belief, as opposed to reliable principles and scientific methods, as the foundation for her opinions. In my review of her credentials, Ms. Whitmore demonstrated no specialized knowledge, skill, experience, training, or education on trafficking. Overall, she failed to adequately cite empirical authorities, scientific methods, or reliable principals to support her opinions. Instead, she cited outdated, out-of-context, demonstrably debunked, unsupported, or misinterpreted “statistics” in her present report and/or past reports. Furthermore, Ms. Whitmore seemingly assumed all of the Plaintiffs’ allegations and/or statements are true. Ms. Whitmore does not seem to have any awareness on the sensitivity, specificity, efficacy, or limitations of human trafficking indicia and interventions. Ms. Whitmore appears to repeatedly conflate prostitution and drug use indicia with sex trafficking.

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## V. CONCLUSION

Ms. Whitmore fails to support any causal link between the time that A.J. and Q.C. allege that they were at the Defendant's property and any physical or mental health impairment. Moreover, the Ms. Whitmore appears to ignore the multiple missed opportunities at prevention and intervention by other actors (e.g. school officials, family, and friends).

Ms. Whitmore has a documented history of testifying unreliably in a manner that could misinform a trier of fact and appears to have possibly overstated her credentials with regards to the niche subject of sex trafficking. Instead, she has engaged in epistemic trespassing (see *Supra* Definitions). While Ms. Whitmore may have competencies as a Guardian Ad Litem and expert on other forms of abuse, she demonstrably lacks competence on human trafficking. Nevertheless, she has attempted to pass opinions which are ***not*** made to a reasonable degree of social scientific certainty or probability or generally accepted within the field.

Epistemic trespassers are not reliable experts in the fields where they are outsiders and therefore their opinions are at risk of misinforming and therefore should be interpreted with caution. Ms. Whitmore's opinions in the present matter are based on misinformation, unsupported speculation or subjective belief, or ecological fallacies, and are not supported by reliable principles and scientific methods.



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## APPENDIX A. Curriculum Vitae

### DR. KIMBERLY B. MEHLMAN-OROZCO

(703) 362-9405 ■ kim@mehlmanorozco.com ■ [www.mehlmanorozco.com](http://www.mehlmanorozco.com)

#### EDUCATION

##### **Doctor of Philosophy**

Criminology, Law and Society  
George Mason University

*Dissertation:* The “Crimmigration” Affect: An Analysis of 287(g) and Latino/a Representation in the U.S. Juvenile Justice System

*Expertise:* Human Trafficking, Human Smuggling, Immigration, Survey Methods and Systematic Review

##### **Master of Arts**

Justice, Law, and Crime Policy  
George Mason University

*Thesis:* Foreign Nationals and Crime: An Exploratory Analysis of Undocumented Migrants in Northern Virginia

##### **Bachelor of Science**

Administration of Justice  
George Mason University

*Cum Laude*

#### TEACHING EXPERIENCE

##### **Surviving and Thriving Beyond Sex Trafficking** SP18

Ph.D. Research Course  
Sustainability Education  
Prescott College

##### **CRIM307 Social Inequality, Crime, and Justice** FA17

Criminology, Law and Society  
George Mason University

##### **CRIM405 Law and Justice Around the World** SP17, SP18

Criminology, Law and Society  
George Mason University

##### **CRIM308 Human Rights and Justice**

FA16  
Criminology, Law and Society  
George Mason University

##### **CCJS100 Intro to Criminal Justice**

FA12-SP14  
Department of Criminology & Criminal Justice  
University of Maryland College Park

##### **CCJS370 Race and Crime**

FA12-SP14  
Department of Criminology & Criminal Justice  
University of Maryland College Park

##### **CCJS432 Law of Corrections**

FA12  
Department of Criminology & Criminal Justice

## CONFIDENTIAL

	University of Maryland College Park
<b>CCJS418J Foreign Nationals and Crime</b>	FA12-SP13 Department of Criminology & Criminal Justice University of Maryland College Park
<b>CRIM490 Foreign Nationals and Crime</b>	SU09, SU10, SU11, SU12 Criminology, Law and Society George Mason University
<b>GED, Work Place Essential Skills, and Adult Basic Education</b>	SU05-SU06 Adult Detention Center Prince William County
<u>RESEARCH EXPERIENCE</u>	
<b>CEO</b>	FA19– Present Break the Chain
<b>Executive Director</b>	WI18– Present Freedom Light
<b>Partner/Human Trafficking Expert Witness</b>	FA16– WI18 Mahn, Mehlman & Associates
<b>Human Trafficking Subject Matter Expert</b>	SU16-FA17 RAND Corporation
<b>Executive Director/Human Trafficking Consultant</b>	WI12– FA16 The Justitia Institute
<b>Director</b>	FA10 – WI12 Latino Policy Institute Roger Williams University
<b>Research Associate</b>	SU11 – WI12 Cochrane Collaboration College for Policy George Mason University
<b>Lead Clinical Trials Search Coordinator</b>	SU10 – WI12 Justice Health Field The Cochrane Collaboration
<b>Senior Research Associate</b>	SU08 – SU11 OJJDP Census of Juveniles on Probation George Mason University
<b>Graduate Research Assistant</b>	SU10 – FA10 Violence and Victimization Research Division National Institute of Justice (On Contract) Office of Justice Programs
<b>Senior Fellow</b>	SU08 – FA10

## CONFIDENTIAL

The Lloyd Society

## Graduate Research Assistant

SU06 – SU08  
Trinidad & Tobago Crime Reduction Project  
George Mason University

## Graduate Research Assistant

WI07-SP07, SP08  
OJJDP Vaccines for Children Project  
George Mason University

ACADEMIC BOOKS/BOOK CHAPTERS

**Mehlman-Orozco, Kimberly** (In Progress). Lies, Damn Lies, and Sex Trafficking Statistics: The Truth Behind America's Failing War Against Sex Trafficking (*Tentative Title*)

**Mehlman-Orozco, Kimberly B.** (2019). The Jihadi Next Door: How ISIS is Forcing, Defrauding, and Coercing Your Neighbor into Terrorism. SkyHorse.

**Mehlman-Orozco, Kimberly B.** (2017). Hidden in Plain Sight: America's Slaves of the New Millennium. ABC-CLIO/Praeger.

Martinez, Ramiro, and **Mehlman-Orozco, Kimberly B.** (2014). "Hispanic Immigration and Crime". Oxford Handbook of Ethnicity, Crime, and Immigration. Eds. Michael Tonry and Sandra Bucerius. Oxford University Press.

PEER REVIEWED JOURNALS

**Mehlman-Orozco, Kimberly** (In Progress). Human Trafficking Hotline Reporting: Do Mandatory Training and Public Awareness Campaigns Make A Difference?

**Mehlman-Orozco, Kimberly** (2024). Sex Trafficking or Secondary Exploitation: The Truth Behind America's Failing War Against Modern Slavery. *International Journal of Academic Research in Public Policy and Governance*.

**Mehlman-Orozco, Kimberly B.** (2017). "Projected Heroes and Self-Perceived Manipulators: Understanding the Duplicitous Identities of Human Traffickers." *Trends in Organized Crime*.

Syme, Sheryl, Camardese, Susan, and **Mehlman-Orozco, Kimberly B.** (2017). "Identifying Victims of Human Trafficking." *Dimensions of Dental Hygiene*.

Syme, Sheryl, Camardese, Susan, and **Kimberly Mehlman-Orozco.** (2017). "Human Trafficking: Red Flags for Dental Professionals." *Decisions in Dentistry*.

**Mehlman-Orozco, Kimberly B.** (2015). "Safe Harbor Legislation for Juvenile Victims of Sex Trafficking: A Myopic View of Improvements in Practice. *Social Inclusion*.

MAGAZINES

**Mehlman-Orozco, Kimberly B.** (2016). "The Plight of Sex-Trafficking Survivors." *The Gay and Lesbian Review Worldwide*.

**Mehlman-Orozco, Kimberly B.** (2016). "Sex Slaves or Prostitutes?: How Human Trafficking is Hidden in Plain Sight in America's Capital." *Diplomatic Courier*.

## CONFIDENTIAL

**Mehlman-Orozco, Kimberly B.** (2016). "America's Symbolic, Not Effective, Anti-Trafficking Policy." *Diplomatic Courier*.

**Mehlman-Orozco, Kimberly B.** (2015). "Tor and the Bitcoin: An Exploration into Law Enforcement Surveillance Capability Online". *Diplomatic Courier*.

**Mehlman-Orozco, Kimberly B.** (2014). "Human Trafficking in the Philippines: A Blemish on Economic Growth". *Diplomatic Courier, Recovery in the Philippines*.

**Mehlman-Orozco, Kimberly B.** (2014). "Devoid of Research: An Evaluation of Human Trafficking Interventions". *Diplomatic Courier, Special Issue: Breaking the Cycle of Human Trafficking*.

OPINION EDITORIALS

**Mehlman-Orozco, Kimberly** (2024). Sex trafficking and prostitution are happening all over Atlanta. *Atlanta Journal-Constitution*.

**Mehlman-Orozco, Kimberly** (2023). 'Sound of Freedom' is a box office hit. But does it profit off trafficking survivors? *USA Today*.

Lowery-Keith, Jennifer and **Kimberly Mehlman-Orozco** (2022). 'Justice Denied': A Sex Trafficking Survivor Tells Her Story. *The Crime Report*.

**Mehlman-Orozco, Kimberly B** and Greg Bristol. (2021). Suing Social Media Sites Won't Curb Sex Trafficking: Advocates. *The Crime Report*.

**Mehlman-Orozco, Kimberly B** and Marisa A. Trasatti. (2021). "Does 'Nirvana' Lawsuit Undermine Struggle Against Trafficking?" *The Crime Report*.

**Mehlman-Orozco, Kimberly B** and Marisa A. Trasatti. (2021). "Britney Spears, human trafficking and the law." *New York Daily News*.

**Mehlman-Orozco, Kimberly B.** (2021). "The 'Racialization' of Sex Trafficking in America." *The Crime Report*.

**Mehlman-Orozco, Kimberly B.** (2021). "COVID-19, the Commercial Sex Industry and Sex Trafficking." *The Crime Report*.

**Mehlman-Orozco, Kimberly B.** (2019). "Jeffrey Epstein's deal with Alexander Acosta wasn't out of line with what I have seen." *USA Today*.

**Mehlman-Orozco, Kimberly B.** and Sheriff William D. Snyder. (2019). "Robert Kraft spa scandal: Sex trafficking is hard to prove, that doesn't mean it's a lie." *USA Today*.

**Mehlman-Orozco, Kimberly B.** and William D. Snyder. (2019). "Legalizing prostitution could end sex-trafficking investigations." *The Hill*.

**Mehlman-Orozco, Kimberly B.** (2019). "How to Fight Sex Trafficking." *Politico*.

**Mehlman-Orozco, Kimberly B.** (2018). "Sex trafficking bill likely to do more harm than good." *The Baltimore Sun*.

## CONFIDENTIAL

- Mehlman-Orozco, Kimberly B.** (2018). "Why cracking down on websites won't stop online sex trafficking." *Thomson Reuters Foundation*.
- Mehlman-Orozco, Kimberly B.** (2018). "Legislation Aiming to Stop Sex Trafficking Would Hurt Investigations." *Homeland Security Today*.
- Mehlman-Orozco, Kimberly B.** (2017). "Trafficking victims get lost under unjust criminal convictions." *The Hill*.
- Mehlman-Orozco, Kimberly.** (2017). "Why we should question the FBI's recent human trafficking sting." *Thomson Reuters*.
- Mehlman-Orozco, Kimberly.** (2017). "Decriminalize sex work to bring trafficking victims out of the shadows." *The Hill*.
- Mehlman-Orozco, Kimberly.** (2017). "Decriminalizing sex work would help bring victims out of the shadows." *The Washington Post*.
- Mehlman-Orozco, Kimberly B.** (2017). "Why the Stop Enabling Sex Traffickers Act is the Wrong Solution." *The Crime Report*.
- Mehlman-Orozco, Kimberly B.** (2017). "Vilifying Backpage.com won't help fight sex trafficking" *The Washington Post*.
- Mehlman-Orozco, Kimberly B.** (2017). "Child Trafficking: The Tragedy of 'Princess'" *The Crime Report*.
- Mehlman-Orozco, Kimberly B.** (2017). "To sue or not to sue third-party businesses for sex trafficking?" *Thomson Reuters Foundation*.
- Mehlman-Orozco, Kimberly B.** (2017). "Hunting the Internet's Sex Predators." *The Crime Report*.
- Mehlman-Orozco, Kimberly B.** (2017). "Will shutting down Backpage.com end the scourge of child sex trafficking in America?" *Thomson Reuters Foundation*.
- Mehlman-Orozco, Kimberly B.** (2017). "Sex Trafficking: A Surprising Rescue Story." *The Crime Report*.
- Mehlman-Orozco, Kimberly B.** (2017). "What every parent should know about sex trafficking." *Baltimore Sun*.
- Mehlman-Orozco, Kimberly B.** and Simon Hedlin. (2017). "Mehlman-Orozco, Hedlin: Stop criminalizing victims of sex trafficking." *The Houston Chronicle*.
- Mehlman-Orozco, Kimberly B.** (2017). "Why Do We Criminalize Young Victims of Sex Trafficking?" *The Crime Report*.
- Mehlman-Orozco, Kimberly B.** (2016). "Sex Trafficking is often hidden in plain sight." *The Hill*.
- Mehlman-Orozco, Kimberly B.** (2016). "Will Legalized Prostitution End the Sex Trafficking Scourge?" *The Huffington Post*.

## CONFIDENTIAL

**Mehlman-Orozco, Kimberly B.** (2016). "What happens after a human trafficking victim is rescued?" *The Hill*.

**Mehlman-Orozco, Kimberly B.** (2016). "The Reality of Sex Trafficking in Washington's Red Light District." *Baltimore Sun*.

**Mehlman-Orozco, Kimberly B.** (2016). America's Anti-Trafficking Efforts: Hollow victories for public accolade. *Connection Newspapers*: Chantilly, Centerville, Great Falls, Herndon, McLean, & Vienna.

**Mehlman-Orozco, Kimberly B.** (2015). "My nail salon may be a front for a brothel." *The Washington Post*.

**Mehlman-Orozco, Kimberly B.** (Contributing Author) (2010) "Breaking It Down: Justice, Law & Society Abstracts for Policymakers and Practitioners". *Center for Justice Law and Society*.

REPORTS

**Mehlman-Orozco, Kimberly B.** (2011). The Effects of In-State Tuition for Non-Citizens: A Systematic Review of the Evidence. *Latino Policy Institute at Roger Williams University*. <http://www.rwu.edu/depository/lpi/lpi-report.pdf>

**Mehlman-Orozco, Kimberly B.** (2008). Race and Reporting Burglary, Robbery, and Assault in Trinidad and Tobago. (Completed under a grant from the Trinidad and Tobago Government).

SCHOLARLY/ PRACTITIONER PRESENTATIONS

**Mehlman-Orozco.** (Forthcoming). Invited Speaker. Lies, Damn Lies, and Statistics: The Truth Behind America's Failing War Against Sex Trafficking and Opportunities for Innovative Evidence-Based Prevention. ASIS International Crime Prevention Council.

**Mehlman-Orozco.** (Forthcoming). Invited Panelist. The Real Face of Child Trafficking in the United States: Understanding how all states are impacted by trafficking and coercion tactics. Public Policy Exchange.

**Mehlman-Orozco, Kimberly,** Elisa Batista (UltraViolet), Renee Williams (National Center for Victims of Crime), et. al. (2024). Invited Presenter and Panelist. Public Policy Exchange Webinar: Forced Marriage.

Connor, James and **Kimberly Mehlman-Orozco.** (2023). X Stage Presentation: Ambient.AI and Sex Trafficking. Global Security Exchange (GSX).

**Mehlman-Orozco, Kimberly.** (2023). Lies, Damn Lies, and Human Trafficking Statistics: The Truth Behind America's Failing War Against Modern Slavery. Global Security Operations Security Leadership Conference.

**Mehlman-Orozco, Kimberly B.** and Greg Bristol. (2023). Lies, Damn Lies, and Human Trafficking Statistics: The Truth Behind America's Failing War Against Modern Slavery. International Association of Professional Security Consultants' (IAPSC) 38th Annual Conference.

Trasatti, Marisa and **Mehlman-Orozco, Kimberly B.** (2022). Hotel Industry and Human Trafficking. South Carolina Bar Convention.

## CONFIDENTIAL

- Trasatti, Marisa, Harvey, Brittany, Loyal, John and **Mehlman-Orozco, Kimberly B.** (2021). Human Trafficking: A Hidden Crime- Civil Litigation, Resolution Of These Claims And The Countermeasures Going Forward. Will Work For Food.
- Trassati, Marisa, **Mehlman-Orozco, Kimberly B.**, and Loyal, John. 2021. Human Trafficking: The Silent Risk. Surplus Line Association (SLA) of California.
- Trasatti, Marisa and **Mehlman-Orozco, Kimberly B.** (2021). Human Trafficking Is Growing Exponentially: What your Corporation and Clients Need to Know about the Evolving Litigation Landscape. Lawyers for Civil Justice Conference.
- Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Harvey, Brittany. (2021). Human Trafficking: The Silent Risk. RIMS Annual Conference.
- Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Yesowitch, Irene, Vorndran, Maryann, and Miller, Graham. (2020). Training to Combat Human Trafficking at Your Commercial Premise. Cyber, Management & Professional Liability Conference.
- Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Clark, Fran, et. al. (2020). Training to Combat Human Trafficking at your Commercial Premise– Learn the Emerging Risks, Litigation Issues and Preventative Measures. Claims and Litigation Management Alliance Conference.
- Trasatti, Marisa, Harvey, Brittany, **Mehlman-Orozco, Kimberly B.**, Ewing, Lance. (2020). Human Trafficking: The Silent Risk. Claims and Litigation Management Alliance Conference.
- Mehlman-Orozco, Kimberly B.** (2019). Freedom Light QAISC Training. Quantico Area Industrial Security Council (QAISC).
- Mehlman-Orozco, Kimberly B.** (2019). Keynote Speaker: National Capital Region Threat Intelligence Consortium (NTIC) Human Trafficking Seminar.
- Mehlman-Orozco, Kimberly B.** (2019). Law Enforcement's Role in Combating Human Trafficking and Assisting Victims. Police Executive Research Forum (PERF).
- Mehlman-Orozco, Kimberly B.** and Marisa Trasatti (2019). Human Trafficking: The Silent Risk. The RIMS (Risk Management Society) Conference.
- Mehlman-Orozco, Kimberly B.** (2019). Social Policy and Justice Panelist. Harvard College Project of Asian and International Relations. Harvard University.
- Mehlman-Orozco, Kimberly B.** (2018). Invited Trainer on Human Trafficking for the Canadian Police College Human Trafficking Investigator's Course, Royal Canadian Mounted Police and Halifax Regional Police, Canada.
- Mehlman-Orozco, Kimberly B.** (2018). Women in Homeland Security Human Trafficking Symposium Panelist. Marymount University.
- Mehlman-Orozco, Kimberly B.** (2018). Invited Trainer on Human Trafficking Provided to the Advancing the Business of Healthcare Medical Coding Chapter in Woodbridge, Virginia (2 CEUs).



## CONFIDENTIAL

- Mehlman-Orozco, Kimberly B.** (2017). Human Trafficking Symposium Panelist. Liberty University School of Law.
- Mehlman-Orozco, Kimberly B.** (2014). Invited Guest Speaker on Mapping Suspected Human Trafficking Networks through Advertisements. Homeland Security Investigations, DHS, Buffalo, NY.
- Martin, Favian, **Mehlman-Orozco, Kimberly**, and Wooditch, Alese. (2014). Mexican Migration to the United States: An Exploratory Study into Illegal Border Crossings. Academy of Criminal Justice Sciences. Philadelphia, PA
- Mehlman-Orozco, Kimberly B.** (2010). "Justice Health Systematic Review Methods," Presented at the annual colloquium of the Cochrane and Campbell Collaborations: Keystone, CO.
- Mehlman-Orozco, Kimberly B.** (2010). "Open Access Systematic Reviews for Juvenile Probation Information," Presented at the first annual OJJDP Probation Summit: Washington, D.C.
- Mehlman-Orozco, Kimberly B.**, Chirieleison, J., Sebold, C. M., Douds, A., Gallagher, A.M., and Gallagher, C.A. (2010). "Characteristics of Juveniles on Probation: Collecting Data from Atlantic to Pacific". Presented at the 2010 American Probation and Parole Association Conference: Washington, D.C.
- Mehlman-Orozco, Kimberly B.** (2010). "Justice Health Search Methods: PubMed and More," Presented at the International Network for Justice Health Meeting: Scottsdale, AZ.
- Gallagher, C.A., Douds, A.S., **Mehlman-Orozco, Kimberly B.**, Chirieleison, J., and Olaghere, A. (2010). "Justice Health Bibliographic Data Mapping," Presented at the International Network for Justice Health Meeting: Scottsdale, AZ.
- Mehlman-Orozco, Kimberly B.** (2010). "Smuggling and the Likelihood of Detention among Undocumented Migrants," Law and Society Association Conference: Chicago, IL.
- Douds, Anne S. and **Mehlman-Orozco, Kimberly B.** (2010). "FASD in Justice Facilities: What does the research tell us?", Meeting of the Interagency Coordinating Committee on Fetal Alcohol Spectrum Disorders: Rockville, MD.
- Gallagher, Catherine, Taxman, Faye, Kinner, Stuart, Doyle, Jodie, Pardo-Rengifo, Monica, **Mehlman-Orozco, Kimberly B.**, Olaghere, Ajima, Royle, Nick, Gabriel Cuervo, Luis. (2009). "Knowledge mapping for research prioritization: examples from the Network for Justice Health". 17<sup>th</sup> Cochrane Colloquium, Singapore.
- Mehlman-Orozco, Kimberly B.** (2009). "Justice Health Systematic Review Methods," Presented at the International Network for Justice Health Meeting: Orlando, FL.
- Mehlman-Orozco, Kimberly B.** (2008). "Foreign Nationals and Crime: An Exploratory Analysis of Undocumented Migrants in Northern Virginia," American Society of Criminology Conference: St. Louis, MO.

OTHER PRESENTATIONS

- Mehlman-Orozco, Kimberly B.** (2018). Invited Annual Speaker for the College of Humanities and Social Sciences Degree Celebration, George Mason University.



CONFIDENTIAL

- Mehlman-Orozco, Kimberly B.** (2018). Invited Presenter for the Well Library Honors Event, George Mason University.
- Mehlman-Orozco, Kimberly B.** (2017). Invited Training Presentation on Human Trafficking Red Flags for Prevent Abuse and Neglect through Dental Awareness (P.A.N.D.A).
- Mehlman-Orozco, Kimberly B.** (2017). Invited Guest Speaker for Human Trafficking Awareness Event with Kappa Delta Phi International Sorority, George Mason University.
- Mehlman-Orozco, Kimberly B.** (2017). Invited Guest Speaker at the Mother's Union International Conference Human Trafficking Forum.
- Mehlman-Orozco, Kimberly B.** (2017). Invited Guest Speaker at the Keeping Our Youth Safe Conference. Bernadette's House.
- Mehlman-Orozco, Kimberly B.** (2016). Invited Guest Speaker for Girls at High-Risk of Sex Trafficking. Manassas City Police Department.
- Mehlman-Orozco, Kimberly B.** (2016). Invited Guest Speaker on Human Trafficking. Woodbridge Woman's Club.
- Mehlman-Orozco, Kimberly B.** (2016). Invited Guest Speaker for TEAM Summer Quest: High-Risk Youth Diversion Program. Manassas City Police Department.
- Mehlman-Orozco, Kimberly B.** (2016). Invited Guest Speaker on Human Trafficking. Soroptimist International, Alexandria Chapter.
- Mehlman-Orozco, Kimberly B.** (2016). Invited Guest Speaker on Human Trafficking. Republican Women of Clifton.
- Mehlman-Orozco, Kimberly B.** (2016). Invited Guest Speaker on Human Trafficking in Northern Virginia. Westminster at Lake Ridge.
- Mehlman-Orozco, Kimberly B.** (2016). Keynote Speaker. Soroptimist Human Trafficking Awareness Event.
- Mehlman-Orozco, Kimberly B.** (2015). Invited Guest Speaker on Human Trafficking. Trinity Episcopal Church.
- Mehlman-Orozco, Kimberly B.** (2015). Invited Guest Speaker for TEAM Summer Quest: High-Risk Youth Diversion Program. Manassas City Police Department.
- Mehlman-Orozco, Kimberly B.** (2014). Invited Guest Speaker for TEAM Summer Quest: High-Risk Youth Diversion Program. Manassas City Police Department.
- Mehlman-Orozco, Kimberly B.** (2013). Exhibitor. Governor's Summit on Human Trafficking. Richmond, VA.
- Mehlman-Orozco, Kimberly B.** (2013). Invited Guest Speaker on Labor Trafficking. St. Francis of Assisi Catholic Church.

## CONFIDENTIAL

**Mehlman-Orozco, Kimberly B.** (2011). Keynote Speaker. First Annual Quetzal Award Gala. Guatemalan Center of New England.

EXPERT WITNESS CASES—CONSULTATION<sup>21</sup> AND/OR TESTIMONY

2024	AJ and QC v. MASP. Case No. LLC. 1:23-cv-04247-JPB
2024	T.S. v. G6 et. al. Civil Action No. 01208
2024	Ramsbottom et. al. v. Lorin Ashton. Case No.: 3:21-cv-00272
2024	N.J. v. G6 Hospitality Property LLC d/b/a Motel 6—Charleston North; and, G6 Hospitality Property LLC d/b/a Motel 6—Columbia. Civil Action No. 2:22-cv-03180-BHH
2024	J.M. v. Choice Hotels International and Red Roof Inns Corporation. Case No. 1:23-cv-00871
2024	R.C. v. Choice Hotels et. al., Case No. 5:23-cv-00872
2024	Karla Norambuena et. al. v. Western Iowa Tech Community College et. al.
2023	A.P. vs. K&S of Aiken, Inc. DBA Kozy Kort Motel, et. al. 2020CP0201021
2023	S.C. v Wyndham Hotel & Resorts, Inc.; Days Inns Worldwide, Inc.; La Quinta Franchising, LLC; Choice Hotels International, Inc.; Six Continents Hotels, Inc.; Holiday Hospitality Franchising, LLC; Crowne Plaza, LLC; Red Roof Inns, Inc.; and Red Roof Franchising, LLC, (N.D. Ohio) 23-cv-00871
2023	M.A. v. WYNDHAM HOTELS & RESORTS, INC. et. al., 19-cv-00849
2023	U.S.A. v. Lacey CR-18-00422-001-PHX-DJH
2023	E.M. v. Tucker Inn Inc. 1:22-cv-02559-WMR
2023	D.H. v. Tucker Inn Inc. 1:22-cv-03419-JPB
2023	H.B. v. Red Roof Inns, Inc.; FMW RRI I, LLC; and RRI West Management LLC, 1:22-cv-01181-JPB
2023	J.C. as mother and legal guardian of I.R. (a minor), v. Skye Hospitality, LLC d/b/a Southside Inn, 1:22-CV00849-MLB
2023	J.C. as mother and legal guardian of I.R. (a minor), v. RITI, INC

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<sup>21</sup> Disclosed consultation only.

CONFIDENTIAL

d/b/a AMERICAN INN & SUITES, 1:22-cv-00848-MHC

2023 G.W. v. Northbrook Industries, Inc. D/B/A United Inn and Suites. Civil Action No. 1:20-cv-05232-JPB

2023 A.G. v. Northbrook Industries, Inc. D/B/A United Inn and Suites. Civil Action No. 1:20-cv-05231-JPB

2023 Free Speech Coalition, et al., v. Angela Colmenero, In Her Official Capacity as Interim Attorney General for the State of Texas

2023 Expert Report for Community Legal Services of Ottawa file No. 20220503-C-0015992R.

2023 Government of the United States Virgin Islands v. JP Morgan Chase Bank, N.A. and JP Morgan Chase Bank, N.A. v. James Edward Staley Case No. 22-cv-10904-JSR

2023 Jane Doe 1 v. JP Morgan Chase & Co. Case No. 1:22-cv-10019-JSR

2023 People of the State of California v. Angelina Avila Case No. BA508653-02

2023 M.H. v. G6 Hospitality LLC, et. al. United States District Court Eastern District of Texas Sherman Division. 4:22-cv-198

2023 United States of America v. Kamal Bhula, et al. United States District Court, For the District of New Mexico. Case No. 1:19-cr-01631-DHU

2023 United States of America v. Mei Xing, United States District Court for the Central District of California. No. 2:20-CR-0228(A)-FMO

2023 Jane Doe v. Fairfax County Police. 1:21cv1150(AJT/JFA).

2022 Charity Pearrow v. ESA P Portfolio LLC, et. al. 21-cv-62276-BLOOM/Valle

2022 K.R. v. 4200 Roosevelt LLC, et. al. Case Number 00552

2022 C.A. v. 4200 Roosevelt LLC, et. al. Case Number 03355

2022 B.H. v. 4200 Roosevelt LLC, et. al. Case Number 03356

2022 K.C. v. 4200 Roosevelt LLC, et. al. Case Number 01926

2022 T.E. v. 4200 Roosevelt LLC, et. al. Case Number 00994

2022 V.S. v. 4200 Roosevelt LLC, et. al. Case Number 00997

2022 Sherman, Gozun, and Nash v. Trinity Teen Solutions, Inc. Case

CONFIDENTIAL

Number 20-CV-215-SWS

2022	N.Z. v. Knights of Trevoise, et. al. Civil Action Number 02642
2022	G.D. v. Knights of Trevoise, et. al. Civil Action Number 02631
2022	Jane Doe 1-4 v. Red Roof Inns, Inc., et. al. Civil Action Number 1:21-cv-04278-WMR
2022	W.K., et. al. v. Red Roof Inns, Inc., et. al. Civil Action Number 1:20-cv-5263-VHC
2022	J.A. v. Red Roof Inns, Inc., et. al. Civil Action Number 1:21-cv-03655-TWT
2022	Casilao et. al. v. Hotelmacher LLC, et. al. Case No.: CIV-17-800-SLP
2022	S.Y. v. Inn of Naples Hotel LLC and Inn of Naples, LLC. Case No.: 2:20-cv-00609-JES
2022	S.Y. v. Naples Hotel Company and the Gulfcoast Inn of Naples Owners Association, Inc. 2:20-cv-00608
2022	C.S. v. Inn of Naples Hotel, LLC and Inn of Naples, LLC 2:20-cv-00629
2022	C.S. v. Naples Hotel Company and the Gulfcoast Inn of Naples Owners Association, Inc. 2:20-cv-00631
2022	People of the State of California v. Diane Mirabal. Superior Court of the State of California for the County of Santa Clara. Case No.: 98312
2021-2023	Casilao et. al. v. Hotelmacher LLC United States District Court Western District of Oklahoma. Case No.: CIV-17-800-SLP
2021-2022	Jane Doe v. TRX Insurance Services, Inc and Richard Metz. United States District Court for the Eastern District of Pennsylvania. Civil Action No. 2:20-cv-04095-MMB
2021-2022	The People of the State of California v. Rachele Eschenburg. Case Number: FCR350232
2021	Heidi Gilbert, Amber Means, Mandy Meloon, Gabriela Joslin, and Kay Poe, v. U.S.A Taekwondo, Inc., District of Colorado
2019-2021	United States v. Matthew Woods, United States District of New Mexico
2019	United States v. Adonis Baker, United States District of New Mexico

CONFIDENTIAL

2019	United States v. Cornelius Galloway, United States District of New Mexico
2018	Woodhull Freedom Foundation et al. v. United States.
2018	RCMP Federal Serious and Organized Crime R vs. Downey & Beals C/O Human Trafficking 2016-465660, Halifax, Canada
2018	United States of America vs. Savanah April Via, U.S. District Court for the District of Arizona
2018	Commonwealth of Virginia v. Corey Cardoza, Henrico County
2018	People v. Kareem Abdur-Razzaaq, Ind. No. 3154/2013, and People v. Lemuel Skipper, Ind. No. 2409/2015, Bronx County
2017-2020	United States of America v. Miguel Scott Arnold, Terrence Hawkins, Tevin Bynoe, Emonie Murphy, and Joshua Guity-Nunez, United States District Court for the Middle District of Pennsylvania.
2017- 2018	Doe v. Subh Properties, et al., Civil Litigation, State of Maryland
2017-2018	State of Ohio v. Michael Moore, Lucas County Court
2017-2018	People of the State of California Plaintiff v. Tracy Sims Superior Court of California, County of Los Angeles
2017	Keo Ratha; Sem Kosal; Sophea Bun; Yem Ban; Nakry Phan; and Sok Sang v. Phatthana Seafood Co., Ltd; S.S. Frozen Food Co., Ltd.; Doe Corporations 1-5; Rubicon Resources, LLC; and Wales & Co. Universe, Ltd. United States District Court for the Central District of California
2017	In re: REFLEX MEDIA, INC., a Nevada corporation, Claimant, vs. VIBE MEDIA, INC. d/b/a CityVibe.com, a California corporation; SOPHIA THOMPSON, an individual; PEAKRIDGE d/b/a SugarModels.com, an Anguilla company; DANIEL ROMAN a/k/a Daniel Romanesse, an individual; ALI ASKARI, an individual; and DOES 1 through 10, inclusive
2016-2017	J.S., S.L., and L.C. v. Village Voice Media Holdings LLC, Supreme Court of the State of Washington
2016-2017	People of the State of California Plaintiff v. James Joseph, et. Al. Contra Costa County Court
2016	People of the State of California Plaintiff v. Young Kyung Cho Superior Court of California, County of Los Angeles

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2016

People of the State of California Plaintiff v. Mixon-Givens  
Santa Clara County Court

SELECTION OF MEDIA

July 27, 2024	Canadian Center for Women's Empowerment. International awareness can prevent trafficking coerced debt, economic abuse and raise economic empowerment.
April 29, 2024	NBC. 101 West: Invisible Chains, exploring human trafficking in the Valley.
June 20, 2023	CBS. St. Charles police arrest five people in connection with human trafficking enterprise.
April 6, 2023	Forbes. Sex Traffickers Used America's Favorite Family Safety App To Control Victims.
January 10, 2023	U.S. News & World Report. Jury Hears Case Alleging 4 Cops Enabled Prostitution Ring.
September 1, 2022	Court TV. Only Fans Model Murder Case.
July 31, 2022	CGTN. Kimberly Mehlman-Orozco on the role of internet in human trafficking.
July 22, 2022	Court TV. Crystal Kizer: Sex Trafficking Murder Case.
December 16, 2021	NPR. The Facts Of, The Myths About, And The Solutions For Child Trafficking.
April 24, 2021	CBS News. Manhattan District Attorney's office to stop prosecuting prostitution cases.
April 10, 2021	Fox News. Human smugglers using social media to transport migrants to US: Reports.
April 4, 2021	Forbes. Inside the \$4.5 Billion Erotic Massage Parlor Economy.
July 4, 2020	CBS News. Epstein's alleged accomplice Ghislaine Maxwell set to be arraigned next week.
January 23, 2020	Skift. Opening Closed Doors: Can Hotels Do More to Fight Human Trafficking?
August 9, 2019	ABC. This Week with George Stephanopoulos. Panel discussion on Jeffrey Epstein.
July 9, 2019	CBS News. Sex trafficking expert discusses Jeffrey Epstein case and sexual abuse.

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May 19, 2019	The Special Report with Areva Martin.
May 10, 2019	Hollywood Reporter. Sex Trafficking mars the Mystique of Cannes Film Festival.
April 12, 2019	The Hill. Expert says it's 'very unlikely' Robert Kraft prostitution case would yield human trafficking convictions.
March 21, 2019	CBS. Robert Kraft solicitation charge puts spotlight on sex trafficking.
March 4, 2019	The Washington Post. Surveillance cameras, suitcases and billionaires: How an investigation into massage parlors unfolded in Florida.
March 1, 2019	USA Today. From harmful fetishes to sex trafficking, Robert Kraft case highlights risks facing Asian women.
February 24, 2019	CNN. Robert Kraft allegations: A sex trafficking expert weighs in.
January 11, 2019	The Seattle Times. Documentary puts new attention on R. Kelly sex allegations.
August 22, 2018	The Crime Report. Backpage Founders: We're Victims of Attack on Free Speech.
May 5, 2018	Delaware Online. Human Trafficking Court shut down, to be merged with other treatment courts in Delaware.
May 1, 2018	Delaware Online. Despite good intentions, Delaware slow to address human trafficking.
April 24, 2018	ABC. Will new law protect women from sex trafficking?
April 23, 2018	The Ringer. How Sex Ads Became a Battleground for the Future of the Internet.
April 22, 2018	Miami Herald. He pimped a minor at Santa's Enchanted Forest. He got slapped with federal prison.
April 13, 2018	Yahoo Lifestyle. Women's March lambasted for criticizing shutdown of Backpage.com.
April 10, 2018	Miami Herald. Florida's sex industry 'in a panic' after feds shut down notorious Backpage website.
April 9, 2018	The Crime Report. With Backpage Closed, Where Will The Sex Slave Trade Go?
March 22, 2018	Washington Post. Bill enabling prosecutors, victims to pursue websites that host sex traffickers heads to White House.

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March 2, 2018	Governing. 3 Cities Lead Fight Against Human Trafficking.
February 1, 2018	Vanity Fair. The Republican Party is Having Another Todd Akin Fiasco.
February 1, 2018	New York Magazine. Missouri GOP Senate Hopeful Goes Off the Deep End on the Sexual Revolution and Human Trafficking.
January 31, 2018	Kansas City Star. Josh Hawley blames sex trafficking on ‘sexual revolution’ of 1960s in leaked audio.
January 25, 2018	Homeland Security Today. Expert Delves Into Real Face of Human Trafficking: Victims and Perpetrators.
January 23, 2018	Huffington Post. Study Finds More Than 9,000 Brothels Masquerading As Legit Businesses.
January 11, 2018	International Business Times. Human trafficking: Why we are all guilty of supporting the modern slave trade.
January 8, 2018	Majority Report Radio. America’s Slaves of the New Millennium with Dr. Kimberly Mehlman-Orozco.
December 21, 2017	Fast Company. Hotels Are Key In The Fight To End Human Trafficking.
December 12, 2017	WNPR. The Colin McEnroe Show. Child Labor In America And Abroad.
November 4, 2017	C-SPAN. Hidden in Plain Sight Book Talk.
September 22, 2017	Gray Media. Interview by Kyle Midura. Sex Trafficking Internet Crackdown Proposal.
August 8, 2017	i24 news. Interview for Stateside with David Shuster. Model allegedly kidnapped for dark web auction.
August 2, 2017	Newsy. Interview for “The Why” on human trafficking on the Internet.
July 30, 2017	Al Jazeera. Segment Produced by Ruairi Casey. World Day Against Human Trafficking.
July 25, 2017	Fox News Radio. Interviewed by Eben Brown. “Security America” segment on human smuggling deaths in San Antonio.
July 25, 2017	Dallas News. Interviewed by Sarah Mervosh. New trick of the sex trade: Pimps can use retail gift cards to buy Backpage.com ads.
July 24, 2017	WJLA. Interviewed by Stephen Loiaconi. Human smuggling deaths underscore need for immigration reform, experts say.



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July 18, 2017	The Washington Post. Interviewed by Tom Jackman. Under attack, Backpage.com has its supporters as anti-trafficking tool. But many differ.
June 11, 2017	PJ Media. Interviewed by Karl Herchenroeder. Expert Notes Gap in Human-Trafficking Laws as Senators Press for Fund Renewal.
April 19, 2017	WYPR. Interviewed by Tom Hall. Misinformation Sparked #DCMissingGirls Outrage, But It Highlights Real And Overlooked Issues.
March 30, 2017	CBS. Interviewed by Jennifer Earl. Mom's warning about "human trafficking" at IKEA goes viral; what you need to know.
March 29, 2017	Women's Health. Interviewed by Korin Miller. This Mom Claims She Encountered Human Traffickers At IKEA And People Are Freaking Out.
February 10, 2017	Miami Herald. Interviewed by David Ovalle. Florida lawsuit targets website decried as hub for human trafficking.
February 3, 2017	Miami Herald. Interviewed by David Ovalle. The 'adult' section might be closed but Miami sex workers still on the job.
January 1, 2017	OutSmart Magazine. Interviewed by Dr. Laura McGuire on Human Trafficking. Hidden in Plain Sight: Researcher Dr. Mehlman-Orozco Discusses the Realities of Human Trafficking.
August 15, 2013	USA Today, Interviewed by Yamiche Alcindor. Dozens of States Pass Laws to Fight Human Trafficking.
June 6, 2013	USA Today. Interviewed by Yamiche Alcindor. Blue Campaign by DHS aims to combat human trafficking.
June 2, 2010	Style Weekly. Interviewed for a human trafficking story by Peter Galuszka, "The New Slavery: Virginia becomes haven for human trafficking."

OTHER PROFESSIONAL CONFERENCES/SUMMITS/TRAININGS**No Room for Trafficking Summit**

Summer 2023

Summit

AHLA Foundation

**Intelligence Community Conference**

Summer 2021

Conference

Traffik Analysis Hub

**Transportation Industry Against Human Trafficking**

Fall 2020

Presentation

U.S. Department of Commerce

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<b>“Freedom Together” D.C., M.D., and V.A. Regional Anti Human Trafficking Task Force Conference</b> Spring 2018	Conference	D.C., M.D., and V.A. Task Forces
<b>Virginia Forum on Human Trafficking</b> Fall 2015	Conference	Dept. of Criminal Justice Services
<b>Regional Conference of Human Trafficking Task Forces</b> Fall 2015	Conference	DMV Anti-Trafficking Working Group
<b>Maryland Freedom Conference</b> Winter 2015	Conference	Towson University
<b>Sharing Lessons, Sharing Responsibility: Combating Human Trafficking</b> Spring 2013	Conference	Migration Policy Institute
<b>Freedom Network Annual Conference</b> Spring 2013	Conference	Freedom Network
<b>Human Trafficking Panel Discussion</b> Spring 2013	Working Group	George Washington Law
<b>Analytic Statistics and Meta Analysis</b> Spring 2011	Paid Training	Stata
<b>Systematic Review and Meta Analysis</b> Spring 2009, Fall 2010	Independent Graduate Study	GMU
<b>PubMed, NLMGateway, ToxNet and ClinicalTrials.gov</b> Summer 2009	Search Certifications	National Library of Medicine
<b>Ovid, ProQuest, and Web searches</b> Summer 2009	Search Certifications	AHRQ
<b>Introduction to ArcGIS Workshops</b> Fall 2009-Summer 2010		George Mason University
<b>Hand Searching Systematic Review Workshop</b> Fall 2009	Search Certifications	Cochrane Collaboration

AWARDS

<i>Independent Publisher Award, 2019</i>	Silver Medal for Current Events ( <u>Jihadi Next Door</u> ).
<i>Independent Publisher Award, 2018</i>	Bronze Medal for Social Issues/Humanitarian ( <u>Hidden in Plain Sight: America’s Slaves of the New Millennium</u> ).
<i>Dissertation Completion Award, 2012</i>	George Mason University, College of Humanities and Social Sciences.
<i>Deans Challenge Award, 2009</i>	George Mason University, College of Humanities and Social

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Sciences.

SERVICE

Peer Reviewer	Office of Justice Programs (OJP), 2020-Present
Panel of Expert Witnesses	Los Angeles Superior Court, WI2017-Present
Reviewer	Journal of Human Trafficking, FA2014-Present
Invited Peer Reviewer	Office of Justice Programs, SP2020-Present
Advisory Board Member	Empower Her Network, FA2017- Present
Volunteer	Prince William County Police Santa Cops, WI2021 & WI 2022
Advisory Board Member	Dressember (Anti-trafficking foundation), SP2017-SU2021
Reviewer	Taylor & Francis Books, SP2021
Reviewer	Justice Quarterly, WI2018- FA2019
Survey Methodologist Advisor	United Against Slavery, FA2017-FA2019
Member	Prince William County Human Trafficking Task Force, SU2013-SU2018
Member	Prince George's County Human Trafficking Task Force, SU2012-SU2014
Member and Former President	Soroptimist International of Woodbridge, FA2015-SP2018
Reviewer	American Journal of Evaluation, FA2014-FA2015
Member	Prince George's County Human Trafficking Task Force, SU2013-2015
Reviewer	Columbia University Press, FA2013
President and Founding Officer	Student Center for Immigration Research, George Mason University, FA2008 – FA2010
Member	Criminology, Law & Society Student Association, George Mason University, FA2009 – WI2012
Volunteer	Prince William County Jail, Classification Department, 500 hours, SP 2005

SAMPLE OF PEER REVIEW SERVICE

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- 2024 “That’s not the Point of This” Complicating and Critiquing Coercive Humanitarianism in the Practice of Service Providers in the U.S. Anti-Trafficking Movement. *Journal of Human Trafficking*.
- 2024 “Where do we Start?” Utilizing GIS to visualize the Wage and Labor Compliance Action Dataset to Inform Proactive Law Enforcement Efforts and Social Service Outreach in Combatting Labor Trafficking in Mississippi." *Journal of Human Trafficking*.
- 2023 A Quasi-Experimental Intervention Trial to Test the Efficacy of a Human Trafficking Awareness Campaign: The Blue Campaign. *Journal of Human Trafficking*.
- 2023 Survivor Women’s Experience on the Pathways of Trafficking in Bangladesh. *Journal of Human Trafficking*.
- 2021 Sex Trafficking Myths and Realities. *Journal of Human Trafficking*.
- 2020 Modern Slavery or Forced Labour? Mechanisms of power and the criminal family firm in the United Kingdom. *Journal of Human Trafficking*.
- 2018 Commercial Sexual Exploitation and Sex Trafficking of Children in South East Asia: A Review of the Literature. *Journal of Human Trafficking*.
- 2017 Preparedness to Serve Commercially Sexually Exploited Children (CSEC): An Integrative Review. *Journal of Human Trafficking*.
- 2016 Evaluation of a Curriculum for Healthcare Professional Training on Child Sex Trafficking. *Journal of Human Trafficking*.
- 2015 Women and Child Trafficking in Nigeria: What Progress? *Journal of Human Trafficking*.
- 2015 Experiences of survivors of human trafficking of non-sexual purposes. *Journal of Human Trafficking*.

PROFESSIONAL MEMBERSHIP

National Society for Collegiate Scholars  
 Phi-Alfa Delta Pre-Law Fraternity  
 Alpha Chi Honors Fraternity  
 American Society of Criminology  
 National Criminal Justice Honors Fraternity  
 Alpha Phi Sigma Honors Society

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## **APPENDIX B. Materials Reviewed and Considered**

In addition to the materials specifically cited or mentioned in my report, I considered the following documents in forming my opinions:

Expert Witness Report of Anique Whitmore  
W.K. et al. Plaintiffs v. Red Roof Inns Transcript of Proceedings